

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY PIEDMONT REGIONAL OFFICE

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David K. Paylor Director

Michael P. Murphy Regional Director

September 14, 2015

Via Email (thorntona@colonialheightsva.gov)

Mr. Scott Thornton Project Coordinator City of Colonial Heights 201 James Ave Colonial Heights, VA 23834

RE: Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VAR040009

Municipal Separate Storm Sewer System (MS4) Annual Report 2013-2014

Dear Mr. Thornton:

This is to advise you that the Department of Environmental Quality – Piedmont Regional Office (DEQ-PRO) has reviewed your Annual Report received on October 1, 2014. DEQ-PRO requested additional information by letter on June 19, 2015 so that the report review could be completed. Based on your response received September 2, 2015 no further information is required as you have satisfied the reporting requirements of the MS4 permit.

The following comments are based on our review of your Annual Report and any additional information provided. Please note this is not meant to be a comprehensive review of the MS4 program plan.

Public Education and Outreach Plan (Section II.B.1)

The Public Education and Outreach Plan should have been developed during the first permit year (by June 30, 2014) for implementation during the second permit year (7/1/14 to 6/30/15).

Make sure that the links to your MS4 Program Plan and Annual Reports are easily accessible to the public on your website and use straightforward naming conventions.

• Construction Site Stormwater Runoff (Section II.B.4)

Appendix F of the Annual Report lists the land disturbing activities and total acreage by month. Provide a total (summed) number for each of these in future Annual Reports.

Post-Construction Stormwater Management (Section II.B.5)

The Annual Report included an Excel spreadsheet indicating 1 new BMP brought online during the reporting year. A review of this spreadsheet noted that the following changes need to be implemented: total acres treated should be separated into pervious and

impervious; 6th order HUC codes should be provided; a status of whether maintenance agreements exists (for private BMPs) should be provided; the date of the operator's most recent inspection should be provided.

Training Schedule and Program (Section II.B.6)

A training schedule should be developed to train all applicable personnel every two years. It is noted that the current training schedule states that 25% of staff must be trained each year. The current permit requirements for training are contained in Section II.B.6.d of the permit.

Thank you for submitting your annual report and for your cooperation in correcting potential deficiencies. Please refer to the Annual Report Reminder Letter dated June 2, 2015 for guidance on what should be included in the next Annual Report. Also, refer to Table 1 of the Permit for scheduled Program Plan updates required for this permit term (24 Months). If we may be of further assistance, please contact me at (804) 527-5012 or joseph.bryan@deg.virginia.gov.

Respectfully,

Joseph B. Bryan Water Permit Writer

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